UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Allen Beaulieu, individually and D/B/A Allen Beaulieu Photography,

CASE NO. 16-cv-3586 (DWF/HB)

Plaintiff,

V.

DECLARATION OF RUSSELL M. SPENCE, JR.

Clint Stockwell, an individual; Studio 1124, LLC, a Minnesota limited liability company and Does 1 through 7,

Defendants.

- I, Russell M. Spence, Jr., depose and state under oath as follows:
- 1. I am the attorney of record for Plaintiff, Allen Beaulieu in the above-captioned matter.
- 2. Attached hereto as **EXHIBIT A** is a true and correct copy of a redline version of Plaintiff's proposed Amended Complaint.
- 3. Attached hereto as **EXHIBIT B** is a true and correct copy of the Amended Complaint, with all of the proposed amended language accepted.

FURTHER YOUR AFFIANT SAYETH NAUGH

Russell M. Spence, Jr

Subscribed to and sworn before me this day of July, 2017.

Notary Public

MARY B BEEMAN
Notary Public
Minnesota
My Commission Expires January 31, 2020